

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

MICHELE BURKE CRADDOCK, Plaintiff, v. LECLAIRRYAN, A PROFESSIONAL CORPORATION, Defendant.	CIVIL ACTION NO. 3:16-cv-11
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MOTION TO DISMISS AND TO COMPEL ARBITRATION

Pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, Defendant LeClairRyan, a Professional Corporation (“LeClairRyan”), by and through counsel, hereby moves this Court to dismiss the Complaint filed by Plaintiff Michele Burke Craddock (“Plaintiff”) on the grounds that this Court lacks subject matter jurisdiction over Plaintiff’s Complaint due to the parties’ agreement to arbitrate all disputes between them or, alternatively, to stay proceedings in this matter and compel Plaintiff to arbitrate the claims contained in her Complaint as agreed to by the parties.

The grounds for this Motion are set forth more fully in LeClairRyan’s contemporaneously filed Memorandum in Support of Motion to Dismiss and to Compel Arbitration.

WHEREFORE, Defendant LeClairRyan respectfully requests that this Court grant its Motion, enter an Order compelling the parties to proceed with arbitration of the claims contained in the Complaint, and enter an Order either dismissing the Complaint or staying proceedings pending the arbitration of the claims contained in the Complaint.

Respectfully submitted,

**LECLAIRRYAN, A PROFESSIONAL
CORPORATION**

By: /s/ Randy C. Sparks, Jr..

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Counsel for Defendant LeClairRyan, a Professional Corporation

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January, 2016, a true copy of the foregoing MOTION TO DISMISS AND TO COMPEL ARBITRATION was electronically filed with the Clerk of Court, which will send a notification of such filing (NEF) to the following:

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